

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Modernizing the E-rate Program for)	WC Docket No. 13-184
Schools and Libraries)	

To: Chief, Wireline Competition Bureau

**REPLY COMMENTS OF
CARLSON WIRELESS TECHNOLOGIES, INC.**

Carlson Wireless Technologies, Inc. (“CWT”)¹ hereby replies to comments filed in the above-captioned proceedings on the Joint Petition for Clarification or, in the Alternative, Waiver of Microsoft Corporation, Mid-Atlantic Broadband Communities Corporation, Charlotte County Public Schools, Halifax County Public Schools, GCR Company, and Kinex Telecom (the “Virginia Petition”) and the Petition for Waiver on behalf of Boulder Valley School District, WC Docket Nos. 13-184 and 10-90 (filed May 16, 2016 (the “BVSD Petition”) (collectively, the “Petitions”). CWT strongly supports both Petitions for the reasons stated by the supporting commenters and for the reasons below. Use of TV white spaces networks to connect school children to their local schools is a vital and important tool in our Nation’s efforts to address the “homework” gap.

¹ CWT is a leading U.S.-based manufacturer of TV white spaces network equipment. CWT has participated in several projects using TV white spaces to address the homework gap issue, including the Gigabit Libraries Whitespace Project. <http://giglibraries.net/page-1712342>.

All commenting parties agree that addressing the homework gap is a critical telecommunications infrastructure mission for the Commission and for America's continuing leadership in the global digital economy.² No party can deny the need of our Nation's low-income children is clear and immediate: 70% of teachers in the U.S. assign homework online, but approximately one-third of low-income U.S. households with students – comprising forty (40) percent of all U.S. households with children -- have no home broadband connection for those children to access that homework and other school network resources.³

Some broadband providers oppose granting the petitions for other reasons. Primarily, they believe that a network connecting children to their local schools may threaten their business interests since those households might otherwise be potential customers for them. In the abstract, that is not an unreasonable business concern. The Commission should certainly not distort competitive marketplace for broadband with USF funding where it can be shown that unsubsidized broadband options are available and *affordable* to those low-income communities.

In the context of the specific facts presented in the Petitions and relief requested, however, these concerns are either overstated or readily addressed. *First*, the Petitions are not seeking Bureau approval to subsidize one broadband provider or service over another. Rather, they merely seek permission to allow the schools to use the existing capacity of the schools' e-rate supported networks for educational purposes, which is highly likely to occur after school hours when that network capacity is otherwise underused. *Second*, the homework gap exists because today's broadband market technologies and providers have not provided affordable

² See, e.g., Comments of NTCA at 2; Comments of the American Libraries Ass'n at 1-2; Comments of WISPA at 2.

³ <http://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap/>; Comments of Boulder Valley School District, at 1.

broadband to this segment of the market. As markets and technologies evolve, the grant of the Petitions will be no impediment for these businesses to offer attractive broadband services to these households at affordable rates. Moreover, the offering of installation, maintenance, and monitoring services for these schools' TV white space wireless networks is a new business opportunity for ISPs, not a threat. *Finally*, some argue that the broadband services meant for students may actually be used for non-educational purposes, but that matter can be addressed through filters, usage limits, and other conditions and enforcement mechanisms.

For the reasons stated above, the Commission should grant the Petitions expeditiously to ensure that *all* school children -- including those in need -- receive the educational opportunities and benefits they deserve as quickly as possible.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'MO'Connor', with a long horizontal flourish extending to the right.

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